



Giacomo Bossa, Esq.
Gbossa@b2b.legal

October 15, 2024

To: Honorable Margaret M. Garnett
District Judge for the United States District Court for the Southern District of
New York
40 Foley Square
Room 2102
New York, NY 10007

**Re: *De Sangosse Agroquimica LTDA v. JDGU Inv. LLC et al.*,
Case No. 23 Civ. 10771
In Re: Joint Motion Letter – Update**

Honorable Margaret M. Garnett:

Pursuant to this Court's order, D.E. 76, the parties submit a join letter updating the court on the discovery status. On November 1, 2024, Mr. Fankbonner and Mrs. Lamping conferred regarding the production of further documents. Mr. Fankbonner informed Mrs. Lamping that his client has no further documents in his custody or possession.

Mr. Fankbonner and Mrs. Lamping further discussed the possibility of an attorney's proffer. Mr. Fankbonner has agreed to provide an attorney's proffer by November 18, 2024. Mr. Fankbonner and Mrs. Lamping also agreed that Mr. Fankbonner's client could be deposed following the attorney's proffer, if considered necessary by Mrs. Lamping.

For these reasons, the parties respectfully request that the court extend discovery until December 8, 2024.

Respectfully submitted,

By: /s/ Giacomo Bossa
GIACOMO BOSSA, ESQ.

By: /s/ Edgar Fankbonner
EDGAR FANKBONNER, ESQ.

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of this Letter Motion was filed and served upon all counsel of record via the Court's CM/ECF Portal, on Friday, November 8, 2024November 8, 2024.

By: /s/ Giacomo Bossa
GIACOMO BOSSA, ESQ.

By: /s/ Edgar Fankbonner
EDGAR FANKBONNER, ESQ.

Application GRANTED. It is hereby ORDERED that fact discovery shall close no later than **December 9, 2024**. It is further ORDERED that the post-fact discovery conference is scheduled for **Tuesday, January 14, 2025 at 9:30 a.m.** in Courtroom 906 of the Thurgood Marshall Courthouse, 40 Foley Square, NY, NY 10007. Any pre-motion letters regarding summary judgment shall be due no later than **December 23, 2024**. Responses or oppositions to pre-motion letters shall be due no later than **January 6, 2025**. Should no party file a pre-motion letter, the parties' joint letter shall be due no later than **January 6, 2025**.

The Clerk of Court is respectfully directed to terminate Dkt. No. 80.

SO ORDERED. Dated November 12, 2024

HON. MARGARET M. GARNETT
UNITED STATES DISTRICT JUDGE